

**Federal Defenders
OF NEW YORK, INC.**

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September 20, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**


John G. Koeltl, U.S.D.J.

9/20/21

RE: United States v. Pimental
21 Cr 451 (JGK)

Dear Judge Koeltl:

The defense writes with the consent of Pretrial Services and the Government to respectfully request modification of Ms. Pimentel's bail conditions. The defense respectfully requests the Court remove the condition of home detention enforced by GPS monitoring and substitute it with a curfew and GPS monitoring.

Ms. Pimentel was granted bail by Judge Rakoff sitting in Part I on August 17, 2021. Her conditions include: a \$100,000 bond co-signed by two financially responsible people, she must reside with her aunt in Mount Vernon, NY, pretrial supervision as directed by Pretrial Services, home detention enforced by electronic monitoring, receiving a COVID-19 vaccination, and the other standard conditions of release. Since her release from the MDC, Ms. Pimentel has been fully compliant with all conditions of her release.

The defense makes this request to allow Ms. Pimentel the ability to walk daily for her health, which has been deteriorating since her incarceration and flexibility in her ability to seek employment. Pretrial and the Government both consent to this modification.

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Respectfully submitted,



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cc: Kevin Mead, Esq.
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